

**South Carolina Environmental Laboratory Advisory Council Meeting
July 26, 2001**

Meeting called to order at 10:10 am at DHEC Quality Training Center, State Park Campus.

Attendance

Paul Fitzgerald	Cheryl Sommers
Lee Barnard	Alfred Baquiran
Michael Moore	Sam Avery
Frances Miller	Charmaine Flemming
T. John Williams	

April 11, 2001 Minutes Accepted

I. Old Business:

- 1) **Permitting Issues:** DHEC representatives attended this meeting, see attached notes.
- 2) **Laboratory Certification Inconsistency Position Letter:** Wayne Davis has received the consistency letter sent by Chair and is waiting for official guidance. No response has been received. Chair will forward to representatives when the response been received.
- 3) **Guidance vs. Requirements:** Discussion about Guidance vs. Requirements which seems to be internally determined by state regulatory officials such as Labcert
 - Requirements should consist of:
 1. Approved methods according to federal regulations such as 40 CFR 136
 2. Footnotes, supplements, and revisions
 3. Method specific requirements (MDL, equipment, accuracy & precision)
 - Guidance consists of:
 1. Policies from other EPA documents or older manuals
 2. Available guidance documents
 3. Technical notes
 - System needs evaluating in order to provide a more clear cut determination of guidance vs. requirements especially in the laboratory evaluation process
 - SCELAC could assist Labcert in developing a review mechanism that evaluators may use in their reports.
- 4) **Proficiency Testing (PT) Issues:**
 - Sam Avery discussed the expense of meeting the proficiency testing (PT) requirements for his laboratory, Rogers & Callcott.
 - Currently Rogers & Callott spends \$7000.00 to meet PT requirements. Additionally, NELAC PT requirements will add \$3000.00 for a total of \$4000.00 for PT annually.
 - PT samples are only available for a limited number of parameters, but as the availability increases, so will the costs.
 - Rogers & Callott is continuously performing PT analyses, especially since North Carolina lab certification requires that quarterly PT be performed.
 - There are also Fedex costs to consider
 - Duplicate parameters for CWA and SDWA such as pH, chlorine, hardness, alkalinity, etc. which adds additional costs

- Performing multiple analyses per method, for example if a laboratory analyzes copper using flame or graphite furnace methods then two PT must be purchased to show proficiency in both methods.
- More dialogue is needed to discuss this problem that may put many commercial laboratories out of business.
- Position letter should be written to EPA Region IV, DHEC LabCert and NIST, the organization that certifies and monitors the PT providers – Sam will prepare a position letter.

II. **New Business**

- 1) ***Guidance Documents:*** The issues of guidance document format and protocol for review was discussed by SCELAC representatives.
 - A guidance document for Demands (BOD, COD, TOC, DO) will be completed by Sam Avery.

Proposed Guidance Document Recommendations:

 - a) Ongoing dialogue should be maintained between SCELAC and LabCert
 - b) A system of guidance document review needs to be in place.
 - c) Proposed changes by LabCert should be reviewed by SCELAC and then added to guidance documents.
 - d) Problems cited at laboratory evaluations should be corrected with guidance.
 - e) Cost benefit analysis should be made before additional guidance is added.
 - f) SCELAC can address problems facing labs to correct certain problems.
 - g) Evaluators should more clearly designate deficiencies from recommendations
 - h) Guidance documents should be reviewed by experts/industries to get comments
 - i) Revision information should be added to each document upon updating them and a request should be made for reviewers.
 - j) A checklist format would be easier to follow.
 - k) Alfred Baquiran and T. Williams presented a proposed format for guidance documents for regulatory metals and organic chemistry analyses. This format was well received by SCELAC representatives and approved as the format for all guidance document revisions. (See attached)
- 2) ***New Representatives:*** SCELAC representatives are to serve 2 years and then rotate of the council. Currently new representatives are being sought. Contact a SCELAC representative if interested.
- 3) ***Microbiological Issues:*** SCELAC representatives want to review the LabCert policy that requires a weekly Coliform positive and a weekly blank for Colilert Presence/Absence analysis. These requirements seem excessive and are not cost effective.
- 4) ***CBOD Limits:*** The current CBOD limit of 164 ± 30.7 mg/L was discussed. However, this limit is not published in Standard Methods. A request to find the published guideline for CBOD.
- 5) ***The Update:*** It is anticipated that SCELAC minutes and information be added to the LabCert *Update* and/or the LabCert website at <http://www.scdhec.net/labcert/>. SCELAC will also obtain an email address to accompany the minutes. T. Williams will discuss this with Connie Turner at LabCert.

- 6) **Chemical Disposal:** The issue of chemical disposal was asked. Where and who could be recommended to dispose of laboratory chemicals. Some members are able to utilize their local POTW (Publically Owned Treated Water) for chemical disposal. Other private sources will be mailed to Charmaine Flemming.
- 7) **Pretreatment Meeting:** At 1:20 the following individuals met with SCELAC representatives to discuss the issue of matrix interference:

Abe Rowson, SCDHEC, Pretreatment Coordinator
William Harrison, Pretreatment Consortium
Sonya Harrison, SCDHEC/Pretreatment Consortium

- Sam Avery did a visual presentation of samples that are affected by matrix interferences.
- DHEC officials wanted the know steps that can be documented to verify matrix interference that would be acceptable to the labs and the pretreatment coordinator.
- When industries receive letters from Pretreatment coordinators about unacceptable data, they most often will contact the laboratory for explanation.
- If the laboratory states matrix interference was the problem, DHEC will not accept this reason because USEPA states that matrix interferences do not exist.
- Final note was that since it is evident that matrix interferences do exist, it is necessary to develop checklist to aid pretreatment coordinators in identifying data that specifies the criteria needed.
- SCELAC will led assistance as needed.

III. **Adjournment**